REMARKS/ARGUMENTS

As set forth in the Office Action, claims 1-4 were rejected as being unpatentable over Khaishgi et al. (U.S. patent application 2004/0034605). No claims are amended, cancelled or added. Applicants respectfully request reconsideration of the application in view of the following remarks.

Khaishgi discloses "techniques for issuing electronic seals such that non-certified parties cannot easily steal or otherwise misuse them" [0004]. Rather than display a locally stored seal image, Khaishgi discloses methods and systems to allow a certified merchant to embed HTML code in its web pages that directs the user's web browser to fetch the seal image from the issuer's seal server [0024]. By serving seals dynamically, the issuer can "updat[e] the media object if the merchant loses its certified status" [0023]. To minimize fraud, the issuer's Admin Server includes "theft detection modules" [0023] that "record the internet protocol (IP) address of the requesting merchant" [0026] as well as "use spidering technology to search network 12 for all occurrences of issued seals" [0027]. "Upon detecting misuse, seal maintenance modules 27 issue a new seal ..., and instruct the merchant to update its web site to point to the new seal" [0026].

Unlike the cited art, Applicant's claims are directed to verifying the identity of a viewed web site to a user in real time using the domain name of the viewed web site. Each of Applicant's four claims includes a method or component for "passing [to the registration server] said Web site's Internet domain name" [pg 32, ln 15-16; pg 33, ln 3-4; pg 33, ln 28; pg 34, ln 19-20]. The domain name is part of the claimed inventions, as it is the key authentication parameter used to identify the viewed site and to access the registration database.

In contrast, Khaishgi discloses neither authentication of the viewed web site in real time nor the use of the viewed web site's domain name in any form. Rather, Khaishgi discloses the use of a "unique identifier" [0024] to reference a media object (i.e. seal) and therefore must employ "theft modules" and "spidering technology" to determine *after the fact* that a seal is being misused. Nowhere does Khaishgi disclose the use of the domain name of the viewed site to authenticate a site to the user. In fact, the word "domain" appears nowhere in the Khaishgi application; not in the abstract, not in the description of the drawings, not in the background and summary, not in the detailed description, nor does the word "domain" appear in any of the 48 claims.

Additionally, claims 1 and 3 encompass an embodiment of the invention that operates outside of the viewed web site, using a separate client side application. No seal, certificate or HTML code is required on the viewed web site for the "client application tool" [p. 33, l. 26] to display registration data. This is because the claimed invention obtains the information it needs to authenticate the viewed web site directly from the user's web browser, which provides the domain name of the viewed site. Khaishgi, in contrast, discloses a system in which the certification data parameter, in the form of HTML code pointing to the seal image, is provided by the site being authenticated. By not relying on the viewed web site to provide the key authentication parameter, the claimed invention reduces the opportunity for fraud and manipulation of the displayed registration data. Nowhere in the Khaishgi disclosure is there any suggestion that certification can take place independently from the site being viewed, as described in the claimed invention.

Finally, unlike Khaishgi, the claimed invention does not require (but would not necessarily preclude) "theft modules" or "spidering technology" because its claims are directed to providing the user with real-time verification of a merchant's identity based on domain name of the viewed site, not on supplying the merchant web site with a valid seal. Because the claimed invention focuses on providing authentication services to the user and not seal services to the merchant, there is no necessity to police registered sites or search for potential thieves. If the domain name of the viewed site is in the claimed invention's database it is authenticated to the user, if not, the site is listed as not authenticated. There is nothing in Khaishgi that discloses a system, such as the claimed invention, that does not require "Theft Detection Modules" [0023; Fig. 2, Item 28].

Applicants respectfully disagree with Examiner's conclusion that the claimed device is disclosed by the cited prior art. Unlike the cited art, the claimed invention is not concerned with issuing electronic seals, but rather is directed to providing to a user authentication of viewed web sites using domain name as the authentication parameter. The viewed web site's Internet domain name is required in six of the nine steps of Applicants Claim 1, six of the eight steps in Applicants Claim 2, and six of the nine components in both Claims 3 and 4, yet the use of the viewed site's domain name appears nowhere in the cited art. Therefore these claims should be found allowable.

For the reasons stated above, we believe that the claims are allowable.

The Commissioner is hereby authorized to charge any required fee in connection with this matter, including for any extension of time, to our Deposit Account No. <u>08-0219</u>. Please apply any charges not covered, or any credits, to Deposit Account No. 08-0219.

Respectfully submitted,

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